

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DARKPULSE, INC.,

Plaintiff,

v.

FIRSTFIRE GLOBAL OPPORTUNITIES
FUND, LLC and ELI FIREMAN

Defendants.

Index No. 1:21-cv-11222 (ER)

**NOTICE OF DEFENDANTS' MOTION TO DISMISS
THE FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon (i) the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the First Amended Complaint, and (ii) the Declaration of Aaron Marks in Support of Defendants' Motion to Dismiss the First Amended Complaint, dated May 26, 2022, and exhibits attached thereto, the undersigned will move this Court before the Honorable Edgardo Ramos, United States District Judge, in Courtroom 619, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007 at a date and time to be determined by the Court, for an order pursuant to Rules 12(b)(1), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure dismissing the First Amended Complaint (Dkt. No. 29) in the above-captioned action in its entirety and with prejudice and for other and further relief the Court may deem just and proper.

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Date: New York, New York
May 26, 2022

Respectfully submitted,

KIRKLAND & ELLIS LLP

/s/ Aaron H. Marks

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